



CITIES & REGIONS
IN THE UNFCCC PROCESS



Submission by the Local Governments and Municipal Authorities Constituency (LGMA)

United Arab Emirates Just Transition Work Programme

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For information on this submission, please contact Jazmin Burgess jburgess@c40.org and Marta Stencel mstencel@c40.org.

1. Background

The Local Governments and Municipal Authorities Constituency (LGMA) welcomes the COP30 Just Transition Work Programme (JTWP) decision, in particular the agreement on the 'key statements' (paragraph 12) and the establishment of the just transition mechanism both representing a significant achievement from Belém. In particular we commend the inclusion of the informal and care economy, addressing energy poverty, the importance of human, gender, and labour rights, social dialogue and social protection, skills development as well as rights to health, food production and focus on locally led approaches to adaptation measures and a reference to the ILO guidelines for a just transition. LGMA also commends the emphasis on whole-of-society and people-centric approaches, as well as the whole-of-economy nature of a just transition. Furthermore, LGMA welcomes the critical inclusion of the importance of scaling up means of implementation and embedding resilience and adaptation within just transition pathways. However, the ambition of the decision was significantly weakened by two key omissions: the lack of inclusion of a just and equitable transition away from fossil fuels and the absence of a reference to the role of subnational governments.

In order to accelerate a just transition implementation and prevent the exacerbation of local inequalities, the crucial role of subnational governments and multilevel governance should be explicitly acknowledged in the outcomes of the 2026 just transition work programme. The 2025 JTWP [Annual Report](#) recognised the critical role of local governments in implementing just energy transition pathways, citing their powers in driving transport electrification, community-level energy access, distributed renewable energy generation, building retrofits, and implementing affordability measures like social tariffs and clean cooking programmes. The report also highlighted their "direct channels for citizen engagement" and saw "locally led approaches in developing, designing and implementing adaptation measures (as) a key opportunity" to advance a just transition. Despite this acknowledgement and similar messages shared by national governments in their submissions and during the Belém negotiation, the final JTWP decision failed to reference, in paragraph 12, subnational governments as key partners and implementers and promoting a whole-of-government or multilevel governance approaches as essential for delivering a just transition.



The lack of this inclusion stands in sharp contrast to the positive momentum seen in recognising subnational governments within other declarations and decisions. Cities and subnational governments' importance was underscored in other key decisions and discussions, such as the [Global Mutirão](#), which emphasised their critical contribution to achieving the Paris Agreement goals, and the outcome of the [4th Ministerial Meeting for Urbanization and Climate Change](#) in Belém which called for the integration of "the principles and priorities of sustainable urban development and multilevel climate action in the deliberations on (...) just transition pathways." This builds on the [CHAMP initiative](#) that enhances collaboration between national and subnational governments in climate policy and finance, with 78 endorsers (77 countries and the European Union) representing 36% of the global population, 69% of GDP, and 40% of emissions. Additionally, G20 leaders acknowledged the crucial role of multilevel governance in financing just transitions, with the 2025 [G20 Leaders Declaration](#) highlighting the need to promote coordination between different levels of government and international financial institutions to attract just transition financing. Finally, the recognition of cities as key partners for national governments in driving just energy transition efforts and the need for coordinated planning across all levels of government were emphasised in International Energy Agency's key outputs, the [Blueprint for Action on Just and Inclusive Energy Transitions](#) and [Indicators Handbook](#).

The following recommendations on the work under the programme, as well as potential topics for dialogue, build on the positive outcomes from the COP30 decision, as well as the identified gaps.

2. Views on work to be undertaken under the programme

Building on the strong COP30 outcome on a just transition, the LGMA recommends, the just transition work programme should seek to **1)** elevate ambition of the 'key statements' in paragraph 12 and **2)** to focus on the establishment and operationalisation of the Just Transition Mechanism in 2026.

2.1. Key statements in paragraph 12

More specifically, paragraph 12 should be strengthened by including the following:

- Explicit reference to the **whole-of-government or multilevel governance approaches and the essential role of subnational governments** as outlined in the 2025 JTWP Annual Report and multiple national governments submissions and oral interventions.
- Inclusion of language on a **just, orderly and equitable transition away from fossil fuels** building on the outcomes of the first Global Stocktake and the key takeaways from the JTWP Dialogue on "Just energy transition pathways and holistic approaches to just transitions".



2.2. Just Transition mechanism

Furthermore, a central focus of the programme's work should be the effective establishment and operationalisation of the Just Transition Mechanism. To be truly equitable and inclusive, this Mechanism should genuinely reflect and center the priorities of the workers and communities who advocated for its creation. Involving subnational governments as partners from the outset is crucial, given their proximity to communities and ability to understand and respond to local realities. Additionally, to ensure that both the Just Transition Work Programme and the new Mechanism remain fit for purpose, preventing duplication or gaps, and that the establishment of the Just Transition Mechanism should be aligned with the JTWP review scheduled for 2026.

3. Views on possible topics for the dialogues under the programme

Based on the above, LGMA recommends the following possible topics for dialogues under the JTWP:

- **Design and operationalization of the Just Transition Mechanism:** To facilitate productive deliberation on the draft decision, it is critical to hold a dedicated dialogue on the Just Transition Mechanism before Bonn 2026 with meaningful participation of all constituencies, including subnational governments. This discussion will be essential to building consensus, establishing links with the JTWP review, identifying governance options, and clarifying how the Mechanism will interact with other relevant bodies and processes both within and outside the UNFCCC.
- **Whole-of-government or multilevel approaches and subnational just transition:** Subnational leaders are in a unique position and have a strong track record of implementing just transition solutions. This encompasses a range of actions, including supporting an inclusive transition away from fossil fuels, designing participatory and socially just climate measures, addressing energy poverty in social housing, improving working conditions and health outcomes for informal workers, and ensuring disadvantaged communities benefit from the transition. The proposed dialogue would: i) showcase effective subnational approaches, ii) demonstrate how these approaches can strengthen national strategies and accelerate implementation, and iii) explore successful multilevel governance to enhance collaboration and policy coherence (e.g. [South Africa](#) or [Spain](#)).

4. Previous submissions

Please refer to our selected LGMA submissions for more details on the role of subnational governments in designing and implementing a just transition.

- [COP30, Just Transition Ministerial statement](#) (2025)
- [COP29, Just Transition Ministerial statement](#) (2024)
- [COP28, Just Transition Ministerial statement](#) by Mayor Bhalla of Hoboken (2023)



- [COP30, Open Dialogue - intervention](#) (2025)
- [Submission on the topic of just energy transition pathways and holistic approaches to just transitions](#) (August 2025)
- [Submission on the topic of enhancing adaptation and climate resilience in the context of just transitions](#) (April 2025)
- [Submission on the topic of ensuring support for people-centric and equitable just transition pathways with a focus on the whole-of-society approach and the workforce](#) (September 2024)